

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TSR LLC,

Plaintiff,

v.

WIZARDS OF THE COAST LLC,

Defendant.

No. 2:21-cv-01705-SKV

**DECLARATION OF LAUREN  
RAINWATER IN SUPPORT OF  
WIZARDS OF THE COAST  
LLC'S MOTION TO ENFORCE  
THE PROTECTIVE ORDER**

WIZARDS OF THE COAST LLC,

Counterclaim Plaintiff,

v.

TSR LLC; JUSTIN LANASA; and DUNGEON  
HOBBY SHOP MUSEUM LLC,

Counterclaim

Defendants.

I, Lauren Rainwater, declare as follows:

1. I am a partner at Davis Wright Tremaine LLP and counsel for Wizards of the Coast LLC in this litigation. This declaration is made in support of the Motion to Enforce the Protective Order. I am over the age of 18 and competent to make this declaration, and I do so on the basis of personal knowledge and my review of records in this case.

1           2.       I have attached as **Exhibit A** a true and correct copy of website screenshots of  
2 donosemora.com captured by my law firm on June 15, 2023. The donosemora.com website was  
3 back online as of June 14, 2023. At the time of this declaration, the web address redirects to a  
4 GoDaddy.com notice that “The domain donosemora.com is registered, but may still be available.  
5 It’s parked free, courtesy of GoDaddy.com.”

6           3.       I have attached as **Exhibit B** Facebook screenshots provided to me by Don  
7 Semora on June 15, 2023.

8           4.       I have attached as **Exhibit C** a true and correct copy of Facebook screenshots of  
9 the Dungeon Hobby Shop Museum’s June 17, 2023, Facebook post sharing the donosemora.com  
10 website, captured by my law firm on June 21, 2023. At the time of declaration, this post is still  
11 active and visible on Facebook.

12           5.       I have attached as **Exhibit D** a true and correct copy of letter correspondence sent  
13 on June 20, 2023, to TSR LLC’s bankruptcy counsel Algernon Butler III regarding Mr. LaNasa’s  
14 violations of the protective order. I have omitted from this copy of the letter exhibits A and C  
15 enclosed with it, as exhibit A to the letter is the Protective Order itself and the remaining materials  
16 contained in those exhibits are already attached as Exhibit A, Exhibit B, and Exhibit C to this  
17 declaration. After I sent this letter to TSR LLC’s bankruptcy counsel, copying Counterclaim  
18 Defendants’ counsel, at least some of the content flagged in this letter apparently was taken down.

19           6.       I have attached as **Exhibit E** email correspondence provided to my law firm by  
20 Mr. Semora on November 6 and 7, 2023. We have redacted personal contact information. Mr.  
21 Semora informed me that, aside from these contacts, the venue representative received other  
22 similar contacts about him, which the representative did not retain.

23           7.       Mr. Semora informed me that he was contacted by an agent from the Michigan  
24 Department of State, Special Investigation Section, Office of Investigative Services,  
25 Enforcement Division, regarding a tip asserting Semora falsely claimed veteran status. Mr.  
26 Semora provided the agent with documentation of his military service, but he expressed that he  
27 was concerned and frustrated with these reports against him.

